



**MEMO ENDORSED**

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## Mars Khaimov Law, PLLC

### VIA ECF

Honorable Judge Valerie Caproni  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

September 24, 2023

Re: *1:23-cv-4187 Toro v. Irish Traditions, LLC.*

### Status Letter and Request for Adjournment of Conference

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 9/27/2023

Dear Judge Caproni:

Plaintiff's counsel submits this letter-motion to seek an adjournment of the initial case management conference and associated submission deadlines. The conference is currently scheduled for September 29, 2023 and the pretrial documents are past due. Plaintiff has not yet been in communication with the Defendant, and will seek a default judgment if they do not appear by the next conference date. As such, Plaintiff proposes a 60-day adjournment and a new date of November 29th, 2023, or a date more convenient to the Court. This is the first time this relief is being requested.

We thank the Court for its attention and consideration in this matter.

Application GRANTED in part. The Initial Pretrial Conference scheduled for September 29, 2023, is hereby ADJOURNED *sine die*. Defendant's answer deadline remains STAYED until **September 29, 2023**. If Defendant does not respond to the complaint by that date, Plaintiff's deadline to move for an order to show cause why default judgment should not be entered is **October 13, 2023**.

Plaintiff is directed to serve a copy of this Endorsement on Defendant and file proof of service on the docket no later than **September 27, 2023**.

Respectfully submitted,

/s/ Mars Khaimov  
Mars Khaimov, Esq.  
Attorney for Plaintiff

SO ORDERED.

Date: 9/27/2023

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

